

COMPLAINT

(For filers who are prisoners without lawyers)

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2019 SEP -9 P 3:59
STEPHEN C. DRIES
CLERK

(Full name of plaintiff(s))

Romeo Steveson Hennings

Case Number 19-C-1304

Vs.

(Full name of defendant(s))

- Milwaukee County Police Department
 - Milwaukee Police Officer Anthony Milone
-

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at Kettle Moraine Correctional Institution, P.O. Box 282, W9071 Forest Drive, Plymouth, WI 53073-0282.
2. Defendants * Milwaukee County Police Department and * Milwaukee Police Officer Anthony Milone is citizens of Wisconsin and resides at *Milwaukee Police Commission 809 N. Broadway #104, Milwaukee, WI 53202 and *Milwaukee Police Department District #5, 2920 N. 4th Street, Milwaukee, WI 53212 and works for the Milwaukee Police Department.

B. STATEMENT OF CLAIM

1. On October 31st, 2018 at approximately 11:15 p.m, Romeo Hennings was involved in a high speed pursuit by several districts of the Milwaukee Police Department, in the city of Milwaukee. This pursuit resulted in a crash where the car side swiped a Milwaukee yellow taxi cab, spent out and crashed a pole on the driver side where the car came to rest.
2. Milwaukee Police Officer later identified as Officer Anthony Milone from 5th district, ran to the driver side window with his gun out pointed in Mr. Hennings face yelling " I'm going to shoot you mother fucker, I'm going to shoot don't move". 3. Being dazed from the impact of the car hitting the pole, paranoid and afraid that Officer Milone was going to shoot, Mr. Hennings put his hands out in front of the steering wheel showing that he surrendered and didn't have a weapon.
4. Officer Milone then grabbed Mr. Hennings by his dread locks (hair) and started trying to pull Mr. Hennings out the driver side window.
5. Officer Milone was pulling so hard that it resulted in him ripping a hand full of dread locks from Mr. Hennings scalp. 6. Officer Milone also punched Mr. Hennings on the left side of his face resulting in it being busted and a little swollen.
7. When Officer Milone ripped Mr. Hennings hair out, Mr. Hennings got free from his grasp and climbed out the passenger side door to get away from this abuse.
8. Another Milwaukee Police Officer who name Mr. Hennings at this time is not aware of grabbed Mr. Hennings and tackled him to the ground, where Officer Milone then jumped on his back and cuffed Mr. Hennings wrist so tight it resulted in swollen cuts and bruises to his wrist. 9. When they picked Mr. Hennings up from the ground he told Officer Milone he needed his asthma pump it was hard for him to breathe. Officer Milone not only took Mr. Hennings asthma pump out his pocket but also refused to give it to him. 10. In the back of the squad car Mr. Hennings asked time and time again for his asthma pump, stating he was wheezing and had server asthma, but wasn't treated for another twenty minutes or so when the paramedics came.

11. The paramedics gave Mr. Hennings a neck brace for his neck injury, and a breathing treatment while they transferred him to St. Mary's Hospital in the city of Milwaukee. There Mr. Hennings was treated for the bursies on his wrist and face, x rays for his head and back and breathing treatments for his asthma.

12. Mr. Hennings later was taken into custody to 5th District Milwaukee Police Department for finger printing, and a sergeant Mr. Hennings does not know his name at this time came to talk to Mr. Hennings about what Officer Milone did. 13. After hearing what Mr. Hennings told him the sergeant went to go check Officer Milone body cam.

14. When the sergeant came back he told Mr. Hennings he did see Officer Milone pulling Mr. Hennings hair out and he had the hair in the evidence room, but the angle of the camera he could not see Officer Milone punch Mr. Hennings. 15. The Sergeant told Mr. Hennings that Officer Milone was being charged with excessive use of force. Another Officer Mr. Hennings doesn't know his name at this time took pictures of Mr. Hennings injuries for the sergeant's report.

C. JURISDICTION

- I am suing for a violation of federal law under 28 U.S.C. § 1331.

D. RELIEF WANTED

16. Being that Mr. Hennings suffered severe physical injuries, including bruises to his thumb and wrist, bruises and permanent bald spot to his head where Officer Milone pulled his hair out, bruises to his face and server pain in his neck and back. Also suffering from post-traumatic stress disorder, trouble sleeping, and anxiety disorder for which Mr. Hennings receives medical and psychological treatment for at Kettle Moraine Correction Institution.

Wherefore, Romeo S. Hennings respectfully pray that this court enter judgment.

17. Granting Mr. Hennings compensatory damages in the amount of \$250,000 against Officer Anthony Milone in his professional and personal capacity.

18. Granting Mr. Hennings punitive damages in the amount of \$250,000 against Officer Milone in his professional and personal capacity.

19. Granting Mr. Hennings both compensatory and punitive damages against the Municipality of Milwaukee as it relates to the Milwaukee Police Department in the amount of \$250,000.

20. For nominal damages Mr. Hennings seek damages in the amount of \$1.00

E. JURY DEMAND

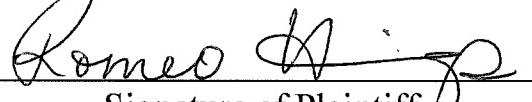
I want a jury to hear my case

- YES - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 3rd day of September 2019.

Respectfully Submitted,



Signature of Plaintiff

571538

Plaintiff's Prisoner ID Number

Kettle Moraine Correctional Institution,
P.O. Box 282 Plymouth, WI 53073
(Mailing Address of Plaintiff)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT
PREPAYING THE FULL FILING FEE

I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to Proceed in District Court without Prepaying the FULL FILING FEE form and have attached it to the complaint.